

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

JASON COURTEMANCHE, BRETT
FORESMAN, JUAN RIOS, AND DENNIS
WILLIAMS, on behalf of themselves and all
others similarly situated,

Plaintiffs,

v.

MOTOROLA SOLUTIONS, INC., CALLYO
2009 CORP., SHI INTERNATIONAL
CORP., and COLONEL JOHN E. MAWN,
JR., Interim Superintendent of the
Massachusetts State Police, in his official
capacity,

Defendants.

Civil Action No.: 4:24-cv-40030-DHH

**DEFENDANTS MOTOROLA SOLUTIONS, INC. AND CALLYO 2009 CORP.'S
MOTION TO DISMISS FIRST AMENDED COMPLAINT**

Defendants Motorola Solutions, Inc. and Callyo 2009 Corp., through undersigned counsel, respectfully request that the Court dismiss with prejudice all claims in the First Amended Complaint against Motorola Solutions, Inc. and Callyo 2009 Corp. pursuant to Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6), and grant such further relief as this Court may deem just and proper, for the reasons set forth in the accompanying memorandum of reasons.

REQUEST FOR ORAL ARGUMENT

Defendants respectfully request oral argument on this motion to dismiss.

LOCAL RULE 7.1(a)(2) CERTIFICATION

Pursuant to Local Rule 7.1(a)(2), the parties have conferred and attempted in good faith to resolve the issues raised in the instant motion without success.

Dated: June 28, 2024

Respectfully submitted,

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/s/ Howard M. Cooper

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CERTIFICATE OF SERVICE

I hereby certify that, on June 28, 2024, a copy of the foregoing was electronically filed with the Clerk of Court of the United States District Court for the District of Massachusetts, using the CM/ECF system, which will send a Notice of Electronic filing to all parties of record.

/s/ Howard M. Cooper

Howard M. Cooper